

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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ROCHELLY BAEZ

Plaintiff,  
v.  
Docket No.:  
11cv9493(RJS)

SOIGNEE K. LLC, INDIAN FASHION HOUSE,  
LLC and SOIGNÉ KOTHARI,

Defendants,  
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**DECLARATION OF SARA R. DAVID IN SUPPORT OF MOTION TO WITHDRAW AS  
COUNSEL AND STAY PROCEEDINGS**

I, Sara R. David, hereby declare pursuant to 28 U.S.C. § 1746:

1. I am an attorney admitted to practice, and in good standing, in this District, am an associate of Cuomo LLC, and counsel of record for Plaintiff Rochelly Baez (“Plaintiff”) in this action. I submit this declaration in support of the Motion to Withdraw as Counsel of Record and Stay Proceedings.

2. This action was commenced on December 23, 2011.

3. Our firm was retained to represent Plaintiff in this matter. Recently, we became aware of information that creates an impending conflict of interest for our firm and will prevent us from effectively and zealously representing the Plaintiff. In order to avoid causing prejudice to our client, additional information related to this conflict of interest can be provided *in camera* at the Court’s request.

4. Accordingly, we discussed these matters with our client, and are working with her to secure alternate representation expeditiously. Nevertheless, at the present time she has been unable to retain new counsel.

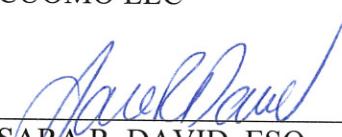
5. In light of the upcoming discovery deadlines, and for all the foregoing reasons, I respectfully request that the Court grant the motion to withdraw as counsel and a temporary stay of sixty (60) days for Plaintiff to retain replacement counsel or appear *pro se*.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York  
June 11, 2012

CUOMO LLC

By:

  
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